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4 Counsel for Defendant PINEDA

5
 6 UNITED STATES DISTRICT COURT
 7 NORTHERN DISTRICT OF CALIFORNIA
 8 SAN FRANCISCO DIVISION
 9

10 UNITED STATES OF AMERICA,) NO. CR 23-00130- 5 JD (LB)
11 Plaintiff,)
12 v.) STIPULATION AND ORDER TO CONTINUE
13 SEVERO PINEDA,) DEFENDANT SEVERO PINEDA'S JUNE 23,
14 Defendant.) 2025 CHANGE OF PLEA HEARING ONE
15) WEEK TO JUNE 30, 2025

16
 17 Counsel for defendant Severo Pineda and counsel for the United States, Assistant United States
 18 Attorney Dan Karmel hereby stipulate and request a one week continuance of the change of plea hearing
 19 currently scheduled for June 23, 2025.

20 Undersigned defense counsel for Mr. Pineda makes the request in order to enable the parties to
 21 finalize their plea agreement. It is anticipated that Mr. Pineda will plead guilty to the Superseding
 22 Information in this case. The parties are available on June 30, 2025. Mr. Pineda has been compliant
 23 with the conditions of his pretrial release and undersigned counsel has confirmed that he is in regular
 24 contact with his assigned officer.

25 Furthermore, counsel for the United States and undersigned counsel for Severo Pineda stipulate
 26 that time should be excluded under the Speedy Trial Act from June 23, 2025, through June 30, 2025.

27 The government and counsel for the defendant agree that time should be excluded under the Speedy

28 STIPULATION TO CONTINUE JUNE 23, 2025:
 CHANGE OF PLEA HEARING TO JUNE 30, 2025;
 [PROPOSED] ORDER
 Case No. CR 23-00130 JD (LB)

v. 7/10/2018

1 Trial Act so that defense counsel can be available for the hearing and continue to prepare including by
 2 reviewing discovery produced by the government. The parties therefore stipulate and agree that
 3 excluding time until June 30, 2025, will allow for the continuity and effective preparation of counsel.
 4 *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served
 5 by excluding the time from June 23, 2025, through June 30, 2025, from computation under the Speedy
 6 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
 7 3161(h)(7)(A), (B)(iv).

8 The undersigned defense counsel certifies that she has obtained the approval of the Assistant
 9 United States Attorney to file this stipulation and proposed order.

10 DATED: June 16, 2025.

/s/ K. Alexandra McClure

11 K. ALEXANDRA MCCLURE
 12 Counsel for Defendant SEVERO PINEDA

13 DATED: June 16, 2025.

/s/ Dan Karmel

14 DAN KARMEL
 15 Counsel for THE UNITED STATES

16
 17 **ORDER**

18 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
 19 change of plea hearing currently scheduled for June 23, 2025, is continued to June 30, 2025. Time is
 20 excluded under the Speedy Trial Act to and including June 30, 2025.

21 IT IS SO ORDERED. DATED:

22 6/18/2025

23 
 24 HON. JAMES DONATO
 25 United States District Court Judge

26
 27
 28 STIPULATION TO CONTINUE JUNE 23, 2025:
 CHANGE OF PLEA HEARING TO JUNE 30, 2025;
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